HARRIS BEACH ₹

ATTORNEYS AT LAW

November 27, 2024

VIA ECF

United States Magistrate Judge Robert W. Lehrburger U.S. District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

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DANIEL R. LECOURS

PARTNER

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Re: Robert Nock v. Spring Energy RRH, LLC et al., United States District Court, Southern District of New York, Case No. 1:23-cv-01042

Dear Judge Lehrburger:

This office represents the Defendants, Spring Energy RRH, LLC d/b/a Spring Power & Gas ("Spring Energy"); RRH Energy Services, LLC ("RRH"); and Richmond Road Holdings, LLC ("Richmond Road") (collectively "Defendants") in the above-referenced matter. We write pursuant to Your Honor's Individual Rules to request that the Court permit the filing under seal of certain items submitted in connection with pending discovery motions (ECF Nos. 204, 205, and 206).

Defendants do not believe that ECF Nos. 204 should be redacted, as the currently redacted items in those letters relate to documents produced by Plaintiff that were designated "Confidential" pursuant to the Protective Order entered in this action which Defendants contend do not qualify for such treatment. This also applies to the first and second redactions in ECF No. 205. Defendants will confer with Plaintiff to determine Plaintiff's position concerning these materials within the timeframe set forth in Your Honor's Individual Rules.

The Court has already sealed the content of the third redaction in ECF No. 205 (ECF No. 61).

The Court has also already sealed the content of the redactions to ECF No. 206 and 206-4 (ECF No. 203).

Thank you for your consideration of this matter.

Respectfully submitted, /s/ Daniel R. LeCours Daniel R. LeCours

Counsel of record (via ECF) cc: